

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

*Federal Insurance Co., et al. v. Al Qaida, et al.*, No. 03-CV-6978

**MOTION OF PLAINTIFFS AXA, CHUBB, MUNICH RE AMERICA, ONEBEACON INSURANCE GROUP, AND TIG INSURANCE COMPANY<sup>1</sup> TO ASSESS DAMAGES AGAINST DEFAULTED DEFENDANTS FOR BUSINESS AND PROPERTY CLAIMS UNDER THE ANTI-TERRORISM ACT**

PLEASE TAKE NOTICE that, pursuant to the Federal Rules of Civil Procedure and based upon the accompanying Memorandum of Law and Affirmation, Plaintiffs AXA, Chubb, Munich Re America, OneBeacon Insurance Group, and TIG Insurance Company, by and through the undersigned counsel, hereby move this Court for an Order assessing damages against the defendants listed in Exhibit B to the Affirmation of Sean P. Carter in Support of the Motion in the amount of \$9,481,764,208.61, the total of the claim indemnity payments, claim adjustment expenses, and claim legal expenses, trebled, in damages against defaulted defendants, jointly and

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<sup>1</sup> As per the Affidavits filed Herewith as Exhibits C-F (filed under seal) to the Affirmation of Sean P. Carter Transmitting Evidence in Support of the Memorandum of Law of Plaintiffs AXA, Chubb, Munich Re America, OneBeacon Insurance Group, and TIG (the "Carter Affirmation"), the AXA Companies Are AXA Art Insurance Company, AXA Global Risks (UK) Ltd., AXA CSA UK Branch; AXA Insurance Company, AXA Reinsurance Company, AXA Re, AXA Re Canadian Branch, AXA Re UK Plc, AXA Versicherung, And SPS Re; The Chubb Companies are Chubb Custom Insurance Company, Chubb Insurance Company of Canada, Chubb Insurance Company of New Jersey, Chubb Indemnity Insurance Company, Federal Insurance Company, Great Northern Insurance Company, Pacific Indemnity Company and Vigilant Insurance Company; and the Munich Re America Companies are American Alternative Insurance Corporation, The Princeton Excess and Surplus Lines Insurance Company and The Great Lakes (UK) Insurance Company.

severally, to which Movants are entitled as of this date under the Anti-Terrorism Act, 18 U.S.C. § 2333(a).

Respectfully submitted,

COZEN O'CONNOR

BY: /s/

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**CERTIFICATE OF SERVICE**

I hereby certify that, pursuant to this Court's Case Management Order No. 2, On February 13, 2007, a true and correct copy of the foregoing Motion of Plaintiffs AXA, Chubb, Munich Re America, OneBeacon Insurance Group, and TIG Insurance Company to Assess Damages Against Defaulted Defendants for Business and Property Claims under the Anti-Terrorism Act was served on all counsel, electronically, via the Court's Electronic Case Filing (ECF) System.

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Dated: February 13, 2007